

**Walker Facility
Shaw Sunland Fabricators, Inc.
Walker, Livingston Parish, Louisiana
Agency Interest Number: 9154**

**Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services**

STATEMENT OF BASIS

**Walker Facility
Shaw Sunland Fabricators, Inc.
Walker, Livingston Parish, Louisiana
Agency Interest Number: 9154
Activity Number: PER20020002
Proposed Permit Number: 1740-00040-V2**

I. APPLICANT

Company:
Shaw Sunland Fabricators, Inc.
30103 Sunland Dr
Walker, Louisiana 70785

Facility:
Shaw Sunland Fabricators, Inc.
30103 Sunland Dr
Walker, Livingston Parish, Louisiana
Approximate UTM coordinates are 708.012 kilometers East and 3376.431
kilometers North, Zone 15

II. FACILITY AND CURRENT PERMIT STATUS

Shaw Sunland Fabricators, Inc. is a designated Part 70 source and currently operates under Permit No. 17400-00040-V1, issued July 23, 1998.

III. PROPOSED PROJECT/PERMIT INFORMATION

Application

A permit application was submitted on July 30, 2002 requesting a Part 70 operating permit renewal/modification for the Shaw Sunland Fabricators. The application was subsequently revised on March 15, 2007.

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Project

Sunland Fabricators, Inc. manufactures piping systems used in industrial applications. Activities at the facility include cutting, forming, welding, sandblasting, and surface coating.

This permit is to consolidate all previously submitted information to renew and modify the existing permit while also proposing new sources at the facility. Through this latest revision, Shaw Sunland proposes the following modifications:

- Addition of 26 new welding machines added to Source ID 3. The welding rod consumption will increase by 65% based on the increased number of welding machines with all other variables remaining constant.
- A new plasma cutter will be added, in the Yuba building, to supplement the existing plasma cutters that are located in the Main Fabrication Shop (Source ID 11). This also includes increased operating time to meet demands of the facility.
- There will be an increase in production for Source ID 1A Outdoor Blast Cleaning, Source ID 1B Enclosed Blast Cleaning, and Source ID 2 Coating Operations. The operating time will increase to meet the demands of the facility.
- Addition and revision of TAPs from all point sources.

Proposed Permit

Permit 17400-00040-V2 will be the Part 70 operating permit renewal/modification of Part 70 operating permit 17400-00040-V1 for the Shaw Sunland Fabricators, Inc.

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Permitted Air Emissions

Estimated emissions in tons per year are as follows:

| <u>Pollutant</u> | <u>Before</u> | <u>After</u> | <u>Change</u> |
|-------------------------------------|---------------|--------------|---------------|
| PM ₁₀ | 3.82 | 53.9 | +50.08 |
| SO ₂ | 0.04 | 0.7 | +0.66 |
| NO _x | 6.68 | 13.9 | +7.22 |
| CO | 1.34 | 3.9 | +2.56 |
| VOC | 88.37 | 75.11 | -13.26 |
| Total Toxic Air Pollutants (TAP) | 42.274 | 80.873 | +38.599 |

IV REGULATORY ANALYSIS

The applicability of the appropriate regulations is straightforward and provided in the Specific Requirements section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit.

Applicability and Exemptions of Selected Subject Items

None

MACT Requirements

For each existing general use coating affected source, limit organic HAP emissions to no more than 0.31 kg (2.6 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period, in accordance with 40 CFR 63 Subpart M.

Air Quality Analysis

None

General Condition XVII Activities

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping

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requirements. For a list of approved General Condition XVII Activities, refer to the Section VIII – General Condition XVII Activities of the proposed permit.

Insignificant Activities

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the proposed permit.

V. PERMIT SHIELD

A permit shield was not requested.

VI. PERIODIC MONITORING

The following monitoring requirements are taken from 40 CFR 63 Subpart MMMM Emission rate without add-on controls option. Demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit in §63.3890, calculated as a rolling 12-month emission rate and determined on a monthly basis. You must meet all the requirements of §§63.3950, 63.3951, and 63.3952 to demonstrate compliance with the emission limit using this option.

Baghouses (including gaskets): Equipment/operational data monitored by technically sound method semiannually or whenever visible emission checks indicate maintenance may be necessary. Change elements as necessary.

Filter vents: Visible emissions monitored by visual inspection/determination daily. If visible emissions are observed, restore operation of the filter to its normal or usual manner of operation as expeditiously as practicable, but at a minimum within three working days, in accordance with good air pollution control practices for minimizing emissions.

VII. GLOSSARY

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Maximum Achievable Control Technology (MACT) – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

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Hydrogen Sulfide (H_2S) – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

New Source Review (NSR) – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C ("Prevention of Significant Deterioration of Air Quality") and D ("Nonattainment New Source Review").

Nitrogen Oxides (NO_x) – Compounds whose molecules consist of nitrogen and oxygen.

Organic Compound – Any compound of carbon and another element. Examples: Methane (CH_4), Ethane (C_2H_6), Carbon Disulfide (CS_2)

Part 70 Operating Permit – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: ≥ 10 tons per year of any toxic air pollutant; ≥ 25 tons of total toxic air pollutants; and ≥ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM_{10} – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide (SO_2) – An oxide of sulfur.

Sulfuric Acid (H_2SO_4) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

Title V Permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than

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those, which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.